

**Principal**  
**Lori Napolitano**

**Athletics/Activities**  
**Administrator**  
**Eric Curtis**



**BONNY EAGLE HIGH SCHOOL**  
[www.bonnyeagle.org](http://www.bonnyeagle.org)

**Assistant Principals**  
**Erin Maguire**  
**Jason Tarr**

**Dean of Students**  
**Amanda Dube**

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Oct. 11, 2017

Chairman Ajit Pai  
Commissioner Mignon Clyburn  
Commissioner Michael O'Rielly  
Commissioner Brendan Carr  
Commissioner Jessica Rosenworcel  
c/o Marlene H. Dortch, Secretary

Federal Communications Commission  
445 12th Street, S.W.  
Washington, D.C. 20554

Re: ET Docket No. 14-165 and GN Docket Nos. 12-268 and 14-166 Via Electronic Filing

Dear Chairman Pai, Commissioner Clyburn, Commissioner O'Rielly, Commissioner Carr, Commissioner Rosenworcel, and Ms. Dortch,

On behalf of Bonny Eagle High School, located in Standish, ME, that provides approximately 20 performances per year to 8,000 audience members and education programs to 1,200 students, I write with concern about available spectrum and protection for our wireless microphones and backstage communications devices.

Bonny Eagle High School offers theatre programs through classes and co-curricular activities to provide the opportunity for students to engage in theatre as an art form through hands-on learning. In all theatre classes, students write and perform plays, design and create scenery, lighting and costumes for productions in front of live audiences.

I strongly support the Commission's proposal to expand Part 74 license eligibility to include persons and organizations that can demonstrate the need for professional, high-quality audio and have the capability of providing it through conscientious use of wireless microphones. We support and endorse the Comments filed in these dockets by The Performing Arts Wireless Microphone Working Group.

School theatre programs and professional performing arts organizations hold thousands of performances each year, and wireless microphones are essential to producing high-quality performances while limiting significant public safety concerns. Professional wireless capability, with successful interference protection, is essential to educational theatre, both in the training and safety of students, onstage and backstage.

Bonny Eagle High School owns 14 wireless microphone systems that have been purchased, one or two per years over the past number of years, after the move out of the 700MHz band was legislated in 2010. In addition we use wireless intercom system that works on the same bandwidth as the wireless microphone systems. The entire investment in wireless technology for our theatre program exceeds \$12,000.00. We maintain our systems carefully and expect them to last at least another ten years, until 2027 before requiring replacement. We use the systems in classes and performances on a daily basis, with the heaviest use during our fall and spring play productions and an annual talent show. If we lose the ability to use the wireless microphone systems, we will be forced to consider cancelling all musical productions, including choral concerts and theatrical productions.

***Our students will graduate prepared to navigate and to succeed in a global workplace.***

I would urge the Commission to grant a Part 74 license if an applicant can provide certification of:

- A mission statement of providing performing arts to the public;
- A history of professional-quality wireless audio presentations to audiences without interference;
- Technical guidance and frequency coordination by qualified professionals (active in audio engineering who have academic degrees or equivalent professional experience and who are familiar with radio-frequency coordination);
- A commitment to register for protection only the frequencies, times, and locations actually needed; and
- A practice of keeping logs of all wireless microphone uses, including frequencies, for all performances.

I appreciate that the Commission has sought Public Comment on this very important issue. Educational institutions and professional performing arts organizations should have access to reliably available spectrum with interference protection. I would request that the Commission consider the burden already borne by the performing arts community in vacating the 700 MHz band. I am concerned about the cost of once again replacing my organization's sound equipment. Once that investment has been made, I would like some assurance that the system will work properly and without interference.

Our budgets are funded primarily by local property taxes and are severely limited to minimize taxes for our residents. Replacement of our wireless microphone systems would be impossible on short notice and would likely take up to five years of incremental budget allowances. During that time, many of the services we provide would be unavailable to students and our audiences.

Besides education, school theatre programs provide demonstrable service to their individual communities, serving as a hub for entertainment, dialogue, and affirmation of student achievement and growth in important 21<sup>st</sup> century skills, such as creativity and collaboration. . They also contribute to local economies in every community across this country. I respectfully endorse the Commission's proposal to expand Part 74 LPAS rules to accommodate schools and performing arts organizations that use fewer than 50 wireless microphones. The proposal is a much-needed solution that benefits the arts community and the public as well as the many new and emerging unlicensed white space technologies.

Sincerely,

A handwritten signature in dark ink, appearing to read 'R. Osann', followed by a horizontal line.

Richard S. Osann  
Theatre Teacher